

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

BLACKMOSS INVESTMENTS INC.,  
Individually and On Behalf of All Others  
Similarly Situated,

Plaintiff,

v.

ACA CAPITAL HOLDINGS, INC. and  
ALAN S. ROSEMAN,

Defendants.

No. 1:07-cv-10528 (RWS)

ANDREW F. ROSE, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

ACA CAPITAL HOLDINGS, INC. and  
ALAN S. ROSEMAN,

Defendants.

No. 1:08-cv-00253 (UA)

**MOTION OF THE INDIVIDUAL INVESTOR GROUP FOR APPOINTMENT AS  
LEAD PLAINTIFF, APPOINTMENT OF LEAD COUNSEL, AND CONSOLIDATION  
OF RELATED ACTIONS**

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE THAT Ramesh Gandhi and Hyman Silverglad (collectively, the "Individual Investor Group" or "Movant") respectfully move this Court, pursuant to Section 27(a)(3)(B) of the Securities Act of 1933 (the "Securities Act") and Section 21D(a)(3)(B) of the Securities and Exchange Act of 1934 (the "Exchange Act"), as amended by the Private Securities Litigation Reform Act of 1995 (the "PSLRA"), 15 U.S.C. §§ 77z-1(a)(3)(B) and 78u-4(a)(3)(B), for entry of an Order: (i) appointing Movant as Lead Plaintiff on behalf of itself and all others similarly situated who purchased or otherwise acquired the common stock of ACA Capital Holdings, Inc. from November 2, 2006 through November 20, 2007, inclusive (the "Class Period"), including purchasers who purchased shares pursuant and/or traceable to the Company's initial public offering on or about November 10, 2006, and incurred damages as a result of the

Defendants' violations of the federal securities laws; (ii) appointing the law firm of Cohen, Milstein, Hausfeld & Toll, P.L.L.C. ("Cohen Milstein") to serve as Lead Counsel; and (iii) consolidating all related actions herewith under Rule 42(a) of the Federal Rules of Civil Procedure.

This motion is supported by the accompanying Memorandum of Law, the Declaration of Catherine A. Torell and the exhibits annexed thereto, all of the prior pleadings and proceedings herein, and such other written or oral argument as may be permitted by the Court.

WHEREFORE, Movant respectfully requests that the Court: (1) appoint Movant as Lead Plaintiff pursuant to Section 27(a)(3)(B) of the Securities Act and Section 21D(a)(3)(B) of the Exchange Act; (2) appoint Cohen Milstein as Lead Counsel for the class; (3) consolidate all pending related actions; and (4) grant such other and further relief as the Court may deem just and proper.

Dated: January 22, 2008

Respectfully submitted,

COHEN, MILSTEIN, HAUSFELD  
& TOLL, P.L.L.C.

/s/ Catherine A. Torell

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***Attorneys for the Individual Investor Group and  
Proposed Lead Counsel for the Class***